

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DYSON TECHNOLOGY LIMITED and)	
DYSON, INC.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 05-434-GMS
)	
MAYTAG CORPORATION,)	
)	
Defendant.)	

JOINT PROPOSED SPECIAL VERDICT FORM (PATENT)

WE, THE JURY, unanimously find as follows:

I. INFRINGEMENT

1. Do you find by a preponderance of the evidence that the Hoover “Fusion” vacuum cleaner infringes the following claim of the ’515 patent? (A “yes” answer to this question is a finding for Dyson. A “no” answer is a finding for Hoover.)

Claim 14	Yes_____	No_____
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2. Do you find by a preponderance of the evidence that the Hoover “Fusion” vacuum cleaner infringes the following claims of the ’748 patent? (A “yes” answer to this question is a finding for Dyson. A “no” answer is a finding for Hoover.)

Claim 15	Yes_____	No_____
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Claim 16	Yes_____	No_____
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Claim 17	Yes_____	No_____
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3. Do you find by a preponderance of the evidence that the Hoover “Fusion” vacuum cleaner infringes the following claims of the ’008 patent? (A “yes” answer to this question is a finding for Dyson. A “no” answer is a finding for Hoover.)

Claim 1 Yes_____ No_____

Claim 2 Yes_____ No_____

Claim 3 Yes_____ No_____

Claim 7 Yes_____ No_____

Claim 11 Yes_____ No_____

Claim 23 Yes_____ No_____

Claim 24 Yes_____ No_____

Claim 25 Yes_____ No_____

II. DAMAGES

4. The parties have agreed to the number of units sold and Hoover’s net revenue from sales of the accused product. If you have found that the Hoover “Fusion” vacuum cleaner infringes at least one of the claims of the patents in suit, what percentage of Hoover’s net revenue is Dyson entitled to as a reasonable royalty rate for Hoover’s infringement?

Royalty Rate %_____

III. WILLFUL INFRINGEMENT

5. If you have found that the Hoover “Fusion” vacuum cleaner infringes at least one of the claims of any of the patents in suit, do you find that Dyson has proven by clear and convincing evidence that Hoover’s infringement was willful? (A “yes” answer to this question is a finding for Dyson. A “no” answer is a finding for Hoover.)

Yes_____ No_____

WHEN THE JURY HAS REACHED A VERDICT, THE FOREPERSON MUST SIGN THIS VERDICT FORM AND SIGNAL THE U.S. MARSHALL THAT THE JURY IS READY TO RENDER A VERDICT.

Date: _____

Jury Foreperson